

HUESTON HENNIGAN LLP

John C. Hueston, State Bar No. 164921

jhueston@hueston.com

Moez M. Kaba, State Bar No. 257456

mkaba@hueston.com

Yahor Fursevich, State Bar No. 300520

yfursevich@hueston.com

523 West 6th Street, Suite 400

Los Angeles, CA 90014

Telephone: (213) 788-4340

Facsimile: (888) 775-0898

Attorneys for Plaintiff

Palantir Technologies Inc.

[Counsel for Defendant Listed on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

PALANTIR TECHNOLOGIES INC., a
Delaware corporation,

Plaintiff,

vs.

MARC L. ABRAMOWITZ, in his individual
capacity and as trustee of the MARC
ABRAMOWITZ CHARITABLE TRUST
NO. 2, KT4 PARTNERS LLC, a Delaware
limited liability company, and DOES 1 through
50, inclusive,

Defendants.

Case No. 5:19-cv-06879-BLF

**JOINT STIPULATION AND [PROPOSED]
ORDER RE: CASE DEADLINES**

Date: N/A

Time: N/A

Courtroom 5 (4th Floor)

Judge: Honorable Beth Labson Freeman

STIPULATION

Plaintiff Palantir Technologies Inc. (“Plaintiff”) and Defendant Marc L. Abramowitz, (“Defendant,” and together with Plaintiff, the “Parties”) respectfully submit this Stipulated Request to modify the case schedule and deadlines in the above-captioned matter.

WHEREAS, on July 29, 2021, the Court held a Case Management Conference, during which it modified the current case schedule and set the following new deadlines and trial date:

- Summary Judgment Hearing: May 12, 2022
- Final Pretrial Conference: August 25, 2022
- Start of Trial: September 26, 2022

WHEREAS, counsel for the Parties have met and conferred, and the Parties have agreed on the remaining case deadlines;

THEREFORE, the Parties, by and through their respective attorneys of record, stipulate to the following deadlines, subject to the Court’s approval:

Case Event	Original Date or Deadline	Revised Date or Deadline
Completion of Party Document Productions	N/A	September 17, 2021
Completion of Fact Depositions, Written Discovery, and Third-Party Discovery	June 4, 2021	December 17, 2021
Last Day to Serve Opening Expert Reports and Disclose Experts by Party with the Burden of Proof	June 25, 2021	January 21, 2022
Last Day to Serve Rebuttal Expert Reports and Disclose Rebuttal Experts	July 16, 2021	February 28, 2022
Completion of Expert Discovery	August 4, 2021	March 25, 2022

IT IS SO STIPULATED.

1 Dated: August 13, 2021

2 By: /s/ Jack P. DiCanio
3 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

4 JACK P. DICANIO (SBN 138782)
5 jack.dicanio@skadden.com
6 ALLEN RUBY (SBN 47109)
7 allen.ruby@skadden.com
8 NIELS J. MELIUS (SBN 294181)
9 niels.melius@skadden.com
10 525 University Avenue
11 Palo Alto, California 94301
12 Telephone: (650) 470-4500
13 Facsimile: (650) 470-4570

14 BARRY SIMON (*pro hac vice*)
15 bsimon@wc.com
16 JONATHAN B. PITT (*pro hac vice*)
17 jpitt@wc.com
18 STEPHEN L. WOHLGEMUTH (*pro hac vice*)
19 swohlgemuth@wc.com
20 WILLIAMS & CONNOLLY LLP
21 725 Twelfth Street, N.W.
22 Washington, D.C. 20005
23 Telephone: (202) 434-5000
24 Facsimile: (202) 434-5029

25 *Attorneys for Defendant*

26 Dated: August 13, 2021

27 By: /s/ Yahor Fursevich
28 HUESTON HENNIGAN LLP

JOHN C. HUESTON (SBN 164921)
jhueston@hueston.com
MOEZ M. KABA (SBN 257456)
mkaba@hueston.com
YAHOR FURSEVICH (SBN 300520)
yfursevich@hueston.com
523 West 6th Street, Suite 400
Los Angeles, CA 90014
Telephone: (213) 788-4340
Facsimile: (888) 775-0898

Attorneys for Plaintiff

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: August 13, 2021

/s/ *Yahor Fursevich*

Yahor Fursevich

[PROPOSED] ORDER

Pursuant to the forgoing stipulation of the parties and for good cause appearing, it is hereby ORDERED that the following schedule and deadlines shall apply to this case:

Case Event	Date or Deadline
Completion of Party Document Productions	September 17, 2021
Completion of Fact Depositions, Written Discovery, and Third-Party Discovery	December 17, 2021
Last Day to Serve Opening Expert Reports and Disclose Experts by Party with the Burden of Proof	January 21, 2022
Last Day to Serve Rebuttal Expert Reports and Disclose Rebuttal Experts	February 28, 2022
Completion of Expert Discovery	March 25, 2022

IT IS SO ORDERED.

Dated: _____, 2021

HONORABLE BETH LABSON FREEMAN
United States District Judge